

# **EXHIBIT R**

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1                   IN THE UNITED STATES COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

5                   ~ ~ ~ ~ ~  
6    IN RE:    NATIONAL PRESCRIPTION    MDL NO. 2804  
7    OPIATE LITIGATION

8                   Case No. 17-mdl-284  
9                   Judge Dan Polster

10                  This document relates to:

11                  The County of Summit, Ohio, et al.,

12                  v.

13                  Purdue Pharma L.P., et al.,

14                  Case No. 1:18-OP-45090 (N.D. Ohio)

15                  ~ ~ ~ ~ ~  
16                  Videotaped deposition of  
17                  ERIC HUTZELL  
18                  January 8, 2019  
19                  9:09 a.m.

20                  Taken at:

21                  Jackson Kelly PLLC  
22                  50 South Main Street Street  
23                  Akron, Ohio  
24                  Wendy L. Klauss, RPR

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1 Motley Rice, for the City of Akron and Summit  
2 County --

3 MR. SALIMBENE: I can't hear great  
4 on the phone, but this is Michael Salimbene for  
5 AmerisourceBergen.

6 MR. PADUKONE: Hi. This is Aseem  
7 Padukone, from Covington & Burling, on behalf  
8 of McKesson Corporation.

9 MR. SCHINNER: Greg Schinner, of  
10 Arnold & Porter, on behalf of the Endo and Par  
11 Defendants.

12 THE VIDEOGRAPHER: Would the court  
13 reporter please swear in the witness.

14 ERIC HUTZELL, of lawful age, called  
15 for examination, as provided by the Statute,  
16 being by me first duly sworn, as hereinafter  
17 certified, deposed and said as follows:

18 EXAMINATION OF ERIC HUTZELL  
19 BY MR. MASTERS:

20 THE VIDEOGRAPHER: Hold on one  
21 second. I apologize.

22 Off the record, 9:11.

23 (Recess taken.)

24 THE VIDEOGRAPHER: On the record,  
25 9:23.

1                   001774240, was marked for purposes  
2                   of identification.)  
3                   - - - - -

4                   Q.        Mr. Hutzell, I'm showing you what  
5                   has been marked as Exhibit 1. Do you recognize  
6                   this document, Mr. Hutzell?

7                   A.        Yes, I do.

8                   Q.        What is it?

9                   A.        It's my cover letter and resume.

10                  Q.        Who is Aimee Wade?

11                  A.        She is the associate clinical  
12                  director of the Summit County ADM Board.

13                  Q.        Did you know her prior to sending  
14                  this application?

15                  A.        Yes, I did.

16                  Q.        It looks like this was dated March  
17                  7, 2016. When were you hired at Summit ADM?

18                  A.        When was I hired or when did I  
19                  start?

20                  Q.        When did you start?

21                  A.        I started on May 2, 2016.

22                  Q.        If you turn to the second page,  
23                  which is -- which appears to be a cover letter  
24                  written by you; is that right?

25                  A.        Yes, sir.

1       in this case, and we have asked you about a  
2       number of the defendants.

3                   So is it fair to say that you  
4       cannot link any of the overdose deaths in  
5       Summit County directly to any particular  
6       defendants in this case?

7                   MR. LEDLIE: Same objection.

8                   A.       Not from my analysis.

9                   Q.       And a similar question, you cannot  
10      link any overdose deaths for prescriptions  
11      filled in Summit County by any of the national  
12      retail defendants?

13                  A.       Not from my analysis.

14                  Q.       You're not aware of any patient who  
15      overdosed with prescription opioids from  
16      Walmart, are you?

17                  A.       No.

18                  Q.       Okay. And the same is true for any  
19      other retail pharmacy defendants that we  
20      mentioned earlier?

21                  A.       None that somebody has said, no.

22                  Q.       And you cannot identify any  
23      individual in Summit County who died because of  
24      prescription opioids that were properly  
25      distributed by Walmart or any of the other